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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**Case No. 3:22-cr-00084-SI**

**v.**

**GOVERNMENT’S EXHIBIT LIST**

**TONY DANIEL KLEIN,**

**Defendant.**

The United States of America hereby gives notice of its intent to offer the following exhibits in the trial of the above-captioned matter. The government respectfully reserves the right to amend this list and to designate additional exhibits as appropriate. Demonstrative exhibits and summary exhibits to be admitted under Rule 1006 are excluded from this list. The government anticipates that the parties will meet and confer about the presentation and admission of such exhibits prior to the deadline for motions in limine.

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**GOVERNMENT’S EXHIBIT LIST**

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Dated: March 8, 2023

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

KRISTEN CLARKE  
ASSISTANT ATTORNEY GENERAL

/s/ Gavin W. Bruce  
GAVIN W. BRUCE  
Assistant United States Attorney

/s/ Cameron A. Bell  
CAMERON A. BELL  
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<b>Number</b>	<b>Description</b>	<b>Bates Range</b>
1	Deposition of Tony Klein (dated Nov. 20, 2019)  (Recording and Transcript)	US00071124 – US00071128; US00092922 – US00093386
2	Tony Klein, Code of Ethics Form (signed), Oct. 5, 2010	US00092205
3	Tony Klein, Code of Ethics Form (signed), Nov. 25, 2011	US00092248
4	Tony Klein, PREA Acknowledgment Form (signed), Dec. 9, 2014	US00092244
5	Tony Klein Training Record	US00002900 – US00002904
6	Letter to Tony Klein re: Duty Station at Home	US00059827 – US00059828
7	Nursing Renewal Application of Tony Klein (2018)	US00009019 – US00009021
8	Stipulated Order for Reprimand, In the Matter of Tony Klein, RN	US00008754 – US00008757, US00008502 – US00008504
9	PDU Training Pod #8 – Boundary Issues – Sharing Sexual Jokes (2015)	US00042877 – US00042879
10	Selected Slides from 2016 PREA Training	US00042909, US00042916, US00042957, US00042972
11	Oregon DOC Policy 20.1.3 – Code of Conduct	US00043102 – US00043108
12	Selected Slides from 2014 Boundaries Training (with redactions)	US00042562 – US00042563, US00042577, US00042585 – US00042586
13	Selected Slides from 2014 PREA Training for Health Services Staff	US00042624, US00042631, US00042634, US00042639, US00042655 – US00042656, US00042708
14	Email re: Tony Klein's Resignation from Coffee Creek	US00050634

15	Email from Cally Wolery re: Minimum Nursing Schedule	US00064874 – US00064875
16	Email from Dave Brown re: Standby Reminder	US00072752
17	Sketch of Housing Units and Camera Locations	US00085840 – US00085846
18	Excerpt from PREA Audit and Assessment Recommendations	US00058061 – US00058062
19	Ericka Sage Training Record	US00004486 – US00004491
20	Photo of [REDACTED] (AV1)	US00094982
21	Grievance Form of [REDACTED] (AV1) (dated Dec. 8, 2017)	US00029700
22	Selected Medical Records of [REDACTED] (AV1)	US00030629, US00030864, US00030918, US00031046
23	Staff Report of Mark Dishion re: [REDACTED] (AV1)	US00051640
24	Misconduct Report of [REDACTED] (AV1)	US00017914
25	Photo of [REDACTED] (AV2)	US00094184
26	Selected Medical Records of [REDACTED] (AV2)	US00038506 – US00038510, US00038733, US00038835 – US00038836, US00039117, US00039146, US00039148, US00039163 – US00039164
27	Letter from [REDACTED] (AV2) to Lori Schain	US00038839
28	Letter from [REDACTED] (AV2) to Rob Persson	US00038840
29	Letter from [REDACTED] (AV2) to Dave Brown	US00038841

30	Letter from [REDACTED] (AV2) to Steve Shelton	US00038842 – US00038844
31	Unusual Incident Report of Alana Bruns re: [REDACTED] (AV2)	US00050670 – US00050673
32	Staff Report of Sydney McKay re: [REDACTED] (AV2)	US00050674
33	SART Interview of Alana Bruns re: [REDACTED] (AV2)	US00050675 – US00050680
34	Photo of [REDACTED] (AV3)	US00094186
35	Grievance of [REDACTED] (AV3) (dated Feb. 5, 2018)	US00029716
36	Grievance of [REDACTED] (AV3) (dated March 6, 2018)	US00029719
37	Grievance of [REDACTED] (AV3) (dated March 7, 2018)	US00029734 – US00029736
38	Grievance of [REDACTED] (AV3) (dated March 7, 2018)	US00029747 – US00029749
39	Grievance of [REDACTED] (AV3) (dated March 8, 2018)	US00029742 – US00029745
40	Grievance of [REDACTED] (AV3) (dated March 9, 2018)	US00029706 – US00029708
41	Grievance of [REDACTED] (AV3) (dated March 10, 2018)	US00029738 – US00029740
42	Grievance of [REDACTED] (AV3) (dated March 12, 2018)	US00029720 – US00029721
43	Grievance of [REDACTED] (AV3) (dated March 15, 2018)	US00029730 – US00029732
44	Grievance Appeal of [REDACTED] (AV3) (dated March 30, 2018)	US00029711
45	Grievance Appeal of [REDACTED] (AV3) (dated March 30, 2018)	US00029724

46	Grievance Appeal of [REDACTED] (AV3) (dated April 7, 2018)	US00029713
47	Grievance Appeal of [REDACTED] (AV3) (dated April 7, 2018)	US00029726
48	Selected Medical Records of [REDACTED] [REDACTED] (AV3)	US00036486, US00036514, US00036551 – US00036552
49	Staff Report of Mohamed Kabli re: [REDACTED] (AV3)	US00050640
50	Kyte to BHS Worker from [REDACTED] (AV3) (dated Feb. 13, 2018)	US00054851
51	Photo of [REDACTED] (AV4)	US00094203
52	Kyte from [REDACTED] (AV4) to Cally Wolery	US00038459
53	Program Callouts of [REDACTED] (AV4)	US00058483 – US00058487
54	Photo of [REDACTED] (AV5)	US00095048
55	Grievance of [REDACTED] (AV5) (dated May 6, 2018)	US00029798
56	Grievance of [REDACTED] (AV5) (dated August 8, 2018)	US00029801 – US00029802
57	Selected Medical Records of [REDACTED] [REDACTED] (AV5)	US00039747
58	Photo of [REDACTED] (AV6)	US00094304
59	Selected Medical Records of [REDACTED] [REDACTED] (AV6)	US00044721, US00044725, US00044727 – US00044728, US00044731 – US00044732, US00044740, US00044792
60	Photo of [REDACTED] (AV7)	US00094216
61	Grievance of [REDACTED] (AV7) (dated May 2, 2021)	US00089143

62	Selected Medical Records of [REDACTED] [REDACTED] (AV7)	US00088547 – US00088548, US00088056, US00088030
63	Photo of [REDACTED] (AV8)	US00094563
64	Grievance of [REDACTED] (AV8) (dated June 4, 2018)	US00029858 – US00029861
65	Grievance Letter by [REDACTED] (AV8) (dated June 4, 2018)	US00029862 – US00029866
66	Selected Medical Records of [REDACTED] [REDACTED] (AV8)	US00029999, US00030088, US00030153
67	Photo of [REDACTED] (AV9)	US00094334
68	Grievance of [REDACTED] (AV9) (dated Dec. 30, 2017)	US00029782
69	Selected Medical Records of [REDACTED] [REDACTED] (AV9)	US00033821 – US00033822, US00034124
70	Kyte of [REDACTED] (AV9)	US00050627
71	Staff Report of Marylou Ward re: [REDACTED] [REDACTED] (AV9)	US00050628
72	Email from Marylou Ward re: [REDACTED] [REDACTED] (AV9)	US00051539
73	Photo of [REDACTED] (AV10)	US00095077
74	Selected Medical Records of [REDACTED] [REDACTED] (AV10)	US00044514 – US00044516
75	Photo of [REDACTED] (AV11)	US00094519
76	Grievance of [REDACTED] (AV11) re: 2017 incident (dated Jan. 25, 2018)	US00029837
77	Grievance of [REDACTED] (AV11) re: 2013 incident (dated Jan. 25 2018)	US00029844
78	Selected Medical Records of [REDACTED] [REDACTED] (AV11)	US00040043, US00040048, US00040055

79	Photo of [REDACTED] (AV12)	US00094489
80	Grievance of [REDACTED] (AV12) (dated Jan. 26, 2018)	US00029809
81	Grievance of [REDACTED] (AV12) (dated Jan. 26, 2018)	US00029816
82	Grievance of [REDACTED] (AV12) (dated April 25, 2018)	US00029824 – US00029825
83	Selected Medical Records of [REDACTED] [REDACTED] (AV12)	US00037083, US00037114, US00037255
84	Photo of [REDACTED] (AV13)	US00094163
85	Programming Records for [REDACTED] [REDACTED] (AV13)	US00087627 – US00087629
86	Photo of [REDACTED] (AV14)	US00095053
87	Grievance of [REDACTED] (AV14) (dated March 16, 2018)	US00029804
88	Grievance Appeal of [REDACTED] [REDACTED] (AV14) (dated March 30, 2018)	US00029807
89	Infirmiry Schedule of [REDACTED] [REDACTED] (AV14)	US00066018 – US00066052
90	Programming Record for [REDACTED] [REDACTED] (AV14)	US00002352
91	Photo of [REDACTED] (AV15)	US00095095
92	Photo of [REDACTED] (AV16)	US00095921
93	Photo of [REDACTED] (AV17)	US00094954
94	Grievance of [REDACTED] (AV17) (dated May 3, 2018)	US00029769 – US00029770
95	Selected Medical Records of [REDACTED] [REDACTED] (AV17)	US00035784, US00036031, US00036030



96	Transcript of Phone Call of [REDACTED] [REDACTED] (AV17)	US00050622 – US00050625
97	Photo of [REDACTED] (AV18)	US00094996
98	Grievance of [REDACTED] (AV18) (dated Dec. 15, 2017)	US00029750
99	Selected Medical Records of [REDACTED] [REDACTED] (AV18)	US00036276, US00036278, US00036424, US00036439
100	Selected Medical Records of [REDACTED] [REDACTED] (AV18)	US00065824, US00065827, US00065829
101	Email from Amanda Van Arcken to Chad Drew re: [REDACTED] (AV18)	US00050626
102	PREA Allegation Checklist re: [REDACTED] [REDACTED] (AV18)	US00051164 – US00051165
103	Photo of [REDACTED] (AV19)	US00093893
104	Photo of [REDACTED] (AV20)	US00095016
105	Journal of [REDACTED] (AV20)	Physical Evidence in FBI Custody
106	Selected Photographs of Journal of [REDACTED] (AV20)	US00095056 – US00095069
107	Photo of [REDACTED] (AV21)	US00094972
108	Programming Record for [REDACTED] [REDACTED] (AV21)	US00002365
109	Photo of Minimum Medical - Triage Exam Room (Taken by Lindsay Noack)	US00066350 – US00066351
110	Photo of Minimum Medical – Triage Exam Room (taken by Lindsay Noack)	US00066362 – US00066365
111	Photo of Minimum Medical Provider Exam Room (Taken by Lindsay Noack)	US00066352
112	Photo of Minimum Medical Provider Exam Room (Taken by Lindsay Noack)	US00066366 – US00066369

113	Photo of G/H Triage Room (Taken by Lindsay Noack)	US00066353
114	Photo of G/H Triage Room (Taken by Lindsay Noack)	US00066360 – US00066361
115	Photo of Medium Medical Clothing Room (Taken by Lindsay Noack)	US00066354 – US00066358
116	Photo of Janitor's Closet (Taken by FBI, 2019)	US00091951
117	Photo of View from Inside Unit Triage Room (Taken by FBI, 2019)	US00091959
118	Photo of Medium Medical Janitor's Closet (Taken by FBI, 2019)	US00091960
119	Photo of G/H Triage Room (Taken by FBI, 2019)	US00091998
120	Photo of Medium Medical Clothing Room (Taken by FBI, 2019)	US00092007
121	Photo of Health Services/Infirmary Cart (Taken by FBI, 2019)	US00092010
122	Photo of Medium Medical Dialysis Room (Taken by FBI, 2019)	US00092020
123	Photos of Minimum (Exterior) (Taken by FBI, 2023)	US00095208; US00095214; US00095216; US00095218; US00095220
124	Photos of Coffee Creek – Minimum (spherical) (Taken by FBI, 2023)	US00095912 – US00095920
125	Photos of Minimum Medical (Entryway from Outside) (Taken by FBI, 2023)	US00095238; US00095240
126	Photos of Minimum Medical (Entryway/Foyer) (Taken by FBI, 2023)	US00095244; US00095246
127	Photo of Minimum Medical Unit (Taken by FBI, 2023)	US00095252

128	Photos of Minimum Medical Triage Exam Room (Taken by FBI, 2023)	US00095254; US00095258; US00095276; US00095290; US00095300; US00095302; US00095304; US00095306
129	Photos of Minimum Medical Area (Taken by FBI, 2023)	US00095316; US00095364; US00095368
130	Photo of View from Minimum Medical Nurse's Station (Taken by FBI, 2023)	US00095376
131	Photo of View to Minimum Medication Room from Triage Room (Taken by FBI, 2023)	US00095382
132	Photos of Minimum Medication Room (Taken by FBI, 2023)	US00095388; US00095398; US00095400; US00095406
133	Photos of G/H Triage Room (Taken by FBI, 2023)	US00095424; US00095426; US00095428
134	Photos of G/H Triage Room (Interior) (Taken by FBI, 2023)	US00095430; US00095432; US00095434; US00095436
135	Photo of G/H Triage Room and Staff Bathroom (Taken by FBI, 2023)	US00095440
136	Photo of Kyte Box on Housing Unit (Taken by FBI, 2023)	US00095456
137	Photo of Medium Health Services (Entryway) (Taken by FBI, 2023)	US00095518
138	Photos of Medium Janitor's Closet near Dialysis Room (Taken by FBI, 2023)	US00095552; US00095554; US00095560
139	Photos of Medium Dialysis Room (Taken by FBI, 2023)	US00095562 – US00095576
140	Photos of Hallway in Medium Medical (Taken by FBI, 2023)	US00095596; US00095598
141	Photos of Medium Medical Nurse's Station (Taken by FBI, 2023)	US00095602; US00095608

142	Photos of Medium Medication Room (Taken by FBI, 2023)	US00095617; US00095619; US00095621; US00095623 US00095625; US00095627; US00095631; US00095633; US00095645
143	Photos of Medium Staff Break Room and Bathroom (Taken by FBI, 2023)	US00095649; US00095651; US00095653; US00095655; US00095663; US00095673; US00095679; US00095681; US00095695; US00095701; US00095703; US00095705; US00095709; US00095711
144	Photos of Medium Medical Provider's Exam Room (Taken by FBI, 2023)	US00095733; US00095739
145	Photo of Medium Medical Hallway (Taken by FBI, 2023)	US00095741
146	Photos of Medium Infirmary Hallway (Taken by FBI, 2023)	US00095749; US00095753; US00095755
147	Photos of Medium Infirmary Janitor's Closet (Taken by FBI, 2023)	US00095757; US00095759, US00095763; US00095765; US00095767; US00095769; US00095771; US00095773; US00095777; US00095779; US00095781; US00095783
148	Photo of Medium Infirmary Officer's Desk (Taken by FBI, 2023)	US00095761
149	Photos of Medium Infirmary "Ante Room" – Foyer Between Inmate Rooms (Taken by FBI, 2023)	US00095785; US00095787; US00095789; US00095791; US00095793; US00095795; US00095797
150	Photos of Medium Infirmary Medical Room (Storage Closet) (Taken by FBI, 2023)	US00095799; US00095801; US00095803; US00095805; US00095807

151	Photos of Medium Medical Clothing Room (Taken by FBI, 2023)	US00095809; US00095811; US00095817; US00095819; US00095821; US00095823; US00095825; US00095827; US00095829; US00095831
152	Photos of View from Medium Medical Clothing Room (Taken by FBI, 2023)	US00095833; US00095835
153	Photos of Medium Medical Clothing Room (Interior) (Taken by FBI, 2023)	US00095839; US00095841; US00095843; US00095845; US00095847; US00095849; US00095851
154	Photos of Medium Medical Storage Closet (Taken by FBI, 2023)	US00095857; US00095859; US00095861; US000958563; US00095865; US00095867; US00095869
155	Photo of Segregation Medical Area (Taken by FBI, 2023)	US00095882; US00095902
156	Photo of Segregation Medical Area (exterior) (Taken by FBI, 2023)	US00095904